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ATTORNEYS FOR TEXAS ENERGY MANAGEMENT

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
	§	
ARUBA PETROLEUM, INC.,	§	CASE NO. 16-42121-11
	§	
DEBTOR.	§	CHAPTER 11

**TEXAS ENERGY MANAGEMENT’S RESPONSE TO
EMERGENCY MOTION TO COMPEL PAYMENT TO ARUBA PETROLEUM, INC.**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Texas Energy Management (“TEM”) and files this Response to Emergency Motion to Compel Payment to Aruba Petroleum, Inc. and would show this Court as follows:

1. TEM always paid BSGA per letter-in-lieu, Exhibit (“1”).
2. TEM does not know how much of that payment is allocated to Aruba and cannot calculate it.
3. BSGA needs to have notice and an opportunity to be heard.
4. TEM suspended payments once it became aware of a dispute between BSGA and Aruba, Exhibits (“2-4”).
5. Aruba needs to work something out with BSGA and give TEM a new letter-in-lieu

signed by both, or a court order.

6. TEM suspended payments, as is customary in the oil and gas business, because of the risk of paying the wrong party or the wrong amount.
7. TEM will interplead the funds if necessary.

Respectfully submitted,

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By: /s/ Dennis Olson

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ATTORNEYS FOR
TEXAS ENERGY MANAGEMENT

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of December, 2016, a true and correct copy of the foregoing document was sent via electronic means or by first class mail, postage prepaid to the persons shown below:

Eric A. Liepins
12770 Coit Road, Suite 1100
Dallas, Texas 75251

Wm. T. Neary
U.S. Trustee
1100 Commerce Street
Room 976
Dallas, Texas 75242-1011

/s/ Dennis Olson

Dennis Olson